

Message

From: Jones, Russell [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4795FDC630C34BE4AED0C6416A20D606-RUSSELL JONES]
Sent: 1/22/2018 7:21:52 PM
To: McNally, Robert [McNally.Robert@epa.gov]
Subject: RE: Biostimulant Question

Bob:

I don't believe anything was on the schedule, but we were waiting until we had our telecon with OECA before moving forward. If USBC provides us with anything, it would likely just be used as a source of info, rather than dropping it into our documents. I still don't know what the focus of the USBC document will be, nor whether it will even be useful until we see it.

Once we are past OECA, Ryne, TJ, and I will get together for next steps.

Russ

From: McNally, Robert
Sent: Monday, January 22, 2018 2:12 PM
To: Jones, Russell <Jones.Russell@epa.gov>; Hartman, Mark <Hartman.Mark@epa.gov>; Wozniak, Chris <wozniak.chris@epa.gov>
Cc: Leahy, John <Leahy.John@epa.gov>
Subject: RE: Biostimulant Question

Russ,

I am checking with BEAD, but do you know their schedule for the econ analysis piece?

How would Beaudreau's analysis help us? I doubt we would merely drop it in and send to OMB.

From: Jones, Russell
Sent: Monday, January 22, 2018 9:32 AM
To: McNally, Robert <McNally.Robert@epa.gov>; Hartman, Mark <Hartman.Mark@epa.gov>; Wozniak, Chris <wozniak.chris@epa.gov>
Cc: Leahy, John <Leahy.John@epa.gov>; Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Gsell, Alyssa <Gsell.Alyssa@epa.gov>
Subject: RE: Biostimulant Question
Importance: High

Bob:

My answers in **RED** below each bullet point.

Russ

From: McNally, Robert
Sent: Friday, January 19, 2018 6:55 PM
To: Jones, Russell <Jones.Russell@epa.gov>; Hartman, Mark <Hartman.Mark@epa.gov>; Wozniak, Chris <wozniak.chris@epa.gov>

Cc: Leahy, John <Leahy.John@epa.gov>

Subject: RE: Biostimulant Question

Mark/Russ/Chris – is this accurate?

Kaitlin,

As background, here is where we stand:

Ex. 5 Deliberative Process (DP)

From: Keller, Kaitlin

Sent: Friday, January 19, 2018 6:28 PM

To: McNally, Robert <McNally.Robert@epa.gov>

Cc: Dinkins, Darlene <Dinkins.Darlene@epa.gov>

Subject: Fwd: Biostimulant Question

Hi Bob,

Nancy received a question about the status of the biostimulant guidance at OMB. Marrone Bio seems to be misinformed but I wanted to touch base to make sure I didn't miss anything. Can you provide input on an appropriate response?

Also, (since we're on the topic now) can you provide an update for Nancy on the status of the guidance and timeline for going to OMB?

Thanks!

Kaitlin

Sent from my iPhone

Begin forwarded message:

From: "Beck, Nancy" <Beck.Nancy@epa.gov>

Date: January 19, 2018 at 5:37:28 PM EST

To: "Keller, Kaitlin" <keller.kaitlin@epa.gov>

Subject: FW: Biostimulant Question

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSP
P: 202-564-1273
M: 202-731-9910

Ex. 6 Personal Privacy (PP)

From: Keith Pitts [<mailto:kpitts@marronebio.com>]

Sent: Friday, January 19, 2018 11:37 AM

To: Beck, Nancy <Beck.Nancy@epa.gov>

Cc: Keith Jones <jones@bpia.org>; David Beaudreau <dbeaudreau@dclrs.com>; Terry Stone <terry.stone@agrinos.com>; Jeff Blackwood <jeff.blackwood@basf.com>

Subject: Biostimulant Question

Nancy, I hope you are well. As you may know, the industry has been working with EPA-BPPD to complete a guidance document that provides clarity about what types of biostimulants fall within the plant growth regulator definition used under FIFRA.

We understand that the guidance document is now with OMB and have been told that OMB may be looking for an economic analysis to support why this guidance document has value to the industry and to the US economy.

If this is the case, the industry is willing to work with EPA and OMB to pull together data to support this review. In order to support this effort, if needed, the industry would appreciate an opportunity to discuss, with EPA and OMB, what information would be needed to support moving this guidance forward. The BPPD staff apparently have not had direct contact with OMB, so we do not know who the industry should be reaching out to at OMB to start a discussion about what information would be useful to support the decision-making process.

Could you possibly help us identify the appropriate contact(s) at EPA and OMB to help move this guidance forward?

As always, thank you for your help with this effort. With best wishes, Keith

Keith Pitts

Chief Sustainability Officer

Senior Vice President-Regulatory and

Government Affairs

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